

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	No. 4:17-cv-2455-CAS
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

Motion for Temporary Restraining Order

Come now Plaintiffs, pursuant to Federal Rule of Civil Procedure 65(b), and move this Court for entry of a temporary restraining order prohibiting Defendant, its officers, employees, or agents, and those acting on their behalf or in concert with them from: (a) giving any order of dispersal in the absence of the use of force or violence; (b) enforcing any order for dispersal without first issuing a clear and unambiguous order to disperse within the five minutes prior to enforcement that allows sufficient opportunity to exit the area, ensuring and notifying individuals of a means of safe egress from the area that is available to individuals, and describing with specificity the area to which the dispersal order applies; (c) arresting, threatening to arrest, or interfering with any individual, including any member of the media or member of the public photographing or recording in public places, unless that person is threatening the safety of others or physically interfering with the ability of law enforcement to perform their duties; (d) retaliating against any individual for photographing or recording in public places; (e) deleting, destroying, or otherwise interfering

with photographs or records made by individuals; (f) utilizing chemical agents (as defined in the Complaint) without first issuing clear and unambiguous warnings that such chemical agents will be utilized; without providing individuals sufficient opportunity to heed the warnings and exit the area; without minimizing the impact of such agents on individuals who are complying with lawful law enforcement commands; and without ensuring that there is a means of safe egress from the area that is available to the individuals.

Entry of a temporary restraining order is appropriate in this case because Plaintiffs are likely to succeed on the merits, there is ongoing irreparable harm to Plaintiffs and other parties not before this Court, the ongoing harm to Plaintiffs absent an injunction outweighs any harm an injunction would cause to Defendant, and the issuance of an injunction is in the public interest.

Bond should be set at \$100.00.

Respectfully submitted,

/s/ Anthony E. Rothert

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Certificate of Service

A copy of the foregoing was served by facsimile and email to the City Counselor for the City of St. Louis on September 22, 2017.

/s/ Anthony E. Rothert